

III. REMARKS

Claims 1-26 remain pending. Claims 1-6, 9-11, 13-16, 18-23 and 26 are rejected under 35 USC 103(a) as being allegedly unpatentable by Angel et al., US 2002/0133392 A1 (Angel). Claims 7-8, 12, 17, and 24-25 are rejected under 35 USC 103(a) as allegedly being unpatentable over Angel in view of Pope et al., US 2003/0055737 A1 (Pope). Applicants have herein amended claims 1 and 18. No new matter is believed added.

Applicants do not acquiesce in the correctness of the rejections and reserve the right to present specific arguments regarding any rejected claims not specifically addressed. Further, Applicants reserve the right to pursue the full scope of the subject matter of the claims in a subsequent patent application that claims priority to the instant application.

With regard to independent claim 1 (and similarly claim 18), Applicants submit that Angel fails to teach each and every feature presented in the claim. Initially, Applicants point out that Angel teaches a content steering engine (see, e.g., Figure 1) that is used to steer an end user to content in a distributed network to address an existing issue (i.e., it provides on-line customer support). Angel does not teach a case management system for managing customer cases. Angel merely provides a system for submitting queries and retrieving content from one or more disparate providers (see, e.g., claim 1).

Conversely, Applicants provide a system that can manage cases, and includes, *inter alia*, “a compliance tracking system that retrieves previously loaded customer compliance data from a database; compares the compliance data for each customer with predetermined levels to determine customer compliance and provides a compliance indicator on the customer case management page.”

In support of its rejection of claim 1, the Office states that Applicants' specification broadly defines the concept of a compliance parameter. However, Applicants do not claim "parameter" and the system of Angel does not have a "compliance tracking system" as claimed in the claimed invention. The system of the claimed invention compares previously uploaded data regarding a customer's compliance with predetermined levels to determine whether a customer is in compliance. In contrast, as the Office notes, the Angel system simply determines "whether a customer should be receiving support from the current support provider or another support provider." Office Action at 3. Angel's system does not pull from previously uploaded information about a customer's compliance (i.e., actions taken by customer, status of customer's account, etc.) as in the claimed invention.

Moreover, as recited in claim 10 (and similarly claims 1 and 18), the present invention provides "displaying a compliance indicator when the customer case management page is viewed." The Office Action alleges that this feature is taught in paragraph 0087 of Angel, as "an exit node indicator on the customer session page." Applicants respectfully traverse this interpretation of Angel. Nowhere does Angel teach or suggest displaying a compliance indicator. Paragraph 0087 of Angel merely states that the "HP printer concept in the Dell CRM content provider's **knowledge map** would be designated an exit node" which would transfer the session to HP. Thus, the exit node only exists in the service provider's knowledge map as a means for transferring the session from one web site to another service provider's web site. Deciding that control of a session should be passed from one web site to another has nothing to do with tracking customer compliance, and no reasonable person could possibly interpret such a node in a map as a **compliance indicator**. In the Angel system, all customers who click on the

link will be passed to a different web site, so the exit node cannot possibly indicate customer compliance.

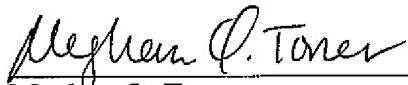
Further, the system of Angel does not teach displaying a compliance indicator on the customer case management page. Even if, arguendo, one did interpret an exit node as a compliance indicator, nowhere does Angel teach displaying the exit node in a customer case management page. Instead, Angel explicitly discloses a dialog that *seamlessly* transfers a user from one web site to another while the user looks to obtain help (see, e.g., para. 0081). In other words, a user of Angel's system is not even aware that a particular item in a dialog is going to send them to a different web site until after they click on the link. Thus, such an item cannot possibly, under any reasonable interpretation, be interpreted to indicate compliance. The Office states that it would have been obvious to one of ordinary skill in the art "to view all cases opened for a given customer with the motivation of allowing retrieval of case information for an entity connected to the immediate network." Office Action, p. 4. Notwithstanding whether this is true or not, Applicants respectfully submit that this is not the same as displaying a compliance indicator on a customer case management page. The Office seems to imply that viewing all cases for a particular customer is equivalent to a compliance indicator. Applicants respectfully disagree. As discussed above, the compliance indicator of the claimed invention displays information processed by the compliance tracking system. It is not simply a recitation of all open cases for any given customer.

Accordingly, Applicants submit that for these reasons, claims 1, 10, 18 are not unpatentable over Angel.

Each of the claims not specifically addressed herein is believed allowable for the reasons stated above, as well as their own unique features. The secondary reference, Pope, fails to remedy the aforementioned deficiencies found in Angel.

Applicants respectfully submit that the application is in condition for allowance. If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned representative at the telephone number listed below.

Respectfully submitted,



Meghan Q. Toner
Reg. No. 52,142

Dated: September 26, 2007

Hoffman, Warnick & D'Alessandro LLC
75 State Street
Albany, NY 12207
(518) 449-0044 - Telephone
(518) 449-0047 - Facsimile